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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO POPKIN INTERROGATORIES DBP/USPS-21 - 22
(September 6, 2001)

On August 27, 2001, DPB/USPS-21 - 22 were filed. As discussed below, the Postal Service will attempt to respond to these questions, but has concerns that pursuit of some of the lines of inquiry will not be fruitful. These items stray into areas of no or limited relevance, and could require undue burden to explore. The Postal Service does not intend for its determination to attempt to provide responses to be construed to waive its objections to these questions.

DBP/USPS-21 consists of a series of questions about the list of facilities that appear in LR-2 and LR-6 because they report in the Mail Condition Reporting System (MCRS), which is the root source of most of the data presented in those two library references. Thus, although the question purports to be a follow-up to LR-6, in practical terms, these inquiries could have been posed as soon as LR-2 became available. More troubling in this instance is the focus on facilities that do not cancel First-Class Mail. Information about those facilities is outside the scope of this proceeding, and would not have been provided at all except that the Postal Service was seeking the quickest way possible to file answers to earlier inquiries. Formatting the library reference to exclude those facilities would merely have delayed the response process. Therefore, the

responses the Postal Service intends to file will in some instances be limited to putting the subjects of the inquiries into appropriate context. Further information on these matters would not materially advance the analysis of the limited issues presented by this complaint.

The self-described purpose of DBP/USPS-22 is "to examine one of the eleven areas in the country as a case study and to determine the reasons why most, but not all, of the processing facilities either processed or did not process mail on a given holiday." By its very terms, this item contemplates a "study" which has, in fact, not been conducted, and does not exist. The study contemplated would be an essentially historical investigation of what happened at particular times and places in the past, and an attempt to identify reasons that might explain why those things happened. As examination of the Postal Service's response to DFC/USPS-76 (filed today) will reveal, however, that merely achieving that first step -- finding out what actually happened -- may not be as simple as it appears. To venture beyond that into the realm of *why* things happened, at the level of historical detail inherent in DBP/USPS-22, may simply be too ambitious an undertaking to initiate with any reasonable confidence of success.

Alternatively, without even attempting to address the specific circumstances described in the question, one could just as easily posit a general explanation that cancellations on past holidays have been performed in instances in which the combination of available staff and available workload made conduct of that operation reasonable. Regardless of the amount of time and effort expended to conduct the "study" that Mr. Popkin is requesting, it seems unlikely that any more useful conclusion than that would be forthcoming. Consequently, the overall utility of the exercise is open

to serious question.

Nevertheless, the Postal Service has forwarded DBP/USPS-22 to the Pacific Area for response. At the moment, it is unclear what type of potentially responsive information might be generated. The Postal Service will evaluate what it has when the time comes to finalize its response, and will file something. The Postal Service, however, does not waive its objection that an open-ended inquiry into the issues raised by DBP/USPS-22 would be focused on historical detail of no material relevance to the overall issues in this proceeding, and would further be unduly burdensome. (The inherent nature of an open-ended investigation precludes quantification of what the associated burden would be.)

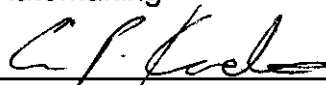
Therefore, the Postal Service objects to DBP/USPS-21 - 22 on the grounds stated above, but, without waiving its objections, will nonetheless attempt to respond.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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September 6, 2001

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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